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Attorneys for Plaintiffs WHITE COAT
 CAPTIONING, LLC; YES CONSULTING,
 LLC; DIALOGUE MÉXICO S.A., AUTUMN
 COMMUNICATIONS, INC., and BUSINESS
 TRAINING WORKS, INC., on behalf of
 themselves and all others similarly situated

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

WHITE COAT CAPTIONING, LLC; YES
 CONSULTING, LLC; DIALOGUE MÉXICO
 S.A. DE C.V.; AUTUMN
 COMMUNICATIONS, INC.; and BUSINESS
 TRAINING WORKS, INC., on behalf of
 themselves and all others similarly situated;

Plaintiffs,

v.

TWITTER, INC.

Defendant.

Case No. 3:23-cv-01594-SK

**JOINT STIPULATION AND
 [PROPOSED] ORDER FOR SCHEDULE
 ON PLAINTIFFS' ANTICIPATED
 FURTHER AMENDED COMPLAINT
 AND X CORP.'S RESPONSIVE
 PLEADINGS PURSUANT TO FEDERAL
 RULE OF CIVIL PROCEDURE 15(a)(2)
 AND CIVIL LOCAL RULE 6-1(a)**

1 Pursuant to Federal Rule of Civil Procedure 15(a)(2) and Civil Local Rule 6-1(a), plaintiffs
2 White Coat Captioning, LLC, YES Consulting, LLC, Dialogue Mexico S.A de C.V., Autumn
3 Communications, Inc., and Business Training Works, Inc. (collectively, “Plaintiffs”), and X Corp.,
4 as successor in interest to named defendant Twitter, Inc. (“X Corp.”), by and through their respective
5 attorneys of record, hereby stipulate, subject to the Court’s approval, that: Plaintiffs will file a further
6 amended complaint by and including October 31, 2023; and, X Corp.’s deadline to file responsive
7 pleadings to that anticipated amended complaint, including a renewed motion to dismiss plaintiff
8 Dialogue Mexico S.A de C.V., will be on and including November 21, 2023.

9 WHEREAS, on June 30, 2023, Plaintiffs filed their current Amended Complaint (ECF No.
10 17).

11 WHEREAS, on July 14, 2023, X Corp. timely filed its Motion to Dismiss Cancomm LLC’s
12 and Dialogue Mexico S.A. de C.V.’s claims under the doctrine of *forum non conveniens*, as modified
13 by *Atl. Marine Constr. Co. v. U.S. Dist. Ct.*, 571 U.S. 49 (2013) (ECF No. 22). X Corp.’s motion
14 argued that Cancomm LLC and Dialogue Mexico S.A. de C.V. agreed to a choice of forum clause,
15 requiring them to litigate their disputes with X Corp. exclusively in the courts of London, England,
16 and under the laws of England and Wales.

17 WHEREAS, on October 10, 2023, the Court granted in part and denied in part X Corp.’s
18 motion (ECF No. 34). The Court’s Order granted X Corp.’s motion to dismiss Cancomm LLC for
19 the reasons argued by X Corp. The Court’s Order, however, denied without prejudice X Corp.’s
20 request to dismiss Dialogue Mexico S.A. de C.V.’s claims. The Court reasoned that X Corp. had
21 not shown that there is a forum selection clause that is binding on Dialogue Mexico S.A. de C.V.,
22 but expressly granted X Corp. leave to renew its motion to dismiss as against that entity (ECF No.
23 34 at 6-7, 10).

24 WHEREAS, Plaintiffs seek to further amend the Amended Complaint to remove allegations
25 concerning Cancomm LLC, and to include additional named plaintiffs.

26 WHEREAS, X Corp. is unaware of the identities of any additional named plaintiffs, takes no
27 position on whether they are proper named plaintiffs in this proceeding, and expressly reserves all
28 rights. X Corp. nonetheless agrees to Plaintiffs’ request to further amend the Amended Complaint,

pursuant to Federal Rule of Civil Procedure 15(a)(2).

WHEREAS, the Parties wish to agree upon a schedule in efforts to ensure efficiency and conservation of party and Court resources in connection with Plaintiffs' anticipated further amended complaint and X Corp.'s responsive pleadings. The Parties have thus agreed, subject to the Court's approval, that Plaintiffs will file a further amended complaint by and including October 31, 2023, and X Corp.'s deadline to respond to that further amended complaint, including (but not limited to) via a renewed motion to dismiss Dialogue Mexico S.A. de C.V.'s claims, shall be by and including November 21, 2023.

WHEREAS, this proposed schedule will not alter the date of any event or deadline already fixed by Court order, and is not sought for the purpose of unnecessary delay.

NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE that Plaintiffs will file a further amended complaint by and including October 31, 2023, and X Corp.'s deadline to file responsive pleadings to such complaint shall be by and including November 21, 2023.

Dated: October 17, 2023

WHITE & CASE LLP

By: /s/ J. Jonathan Hawk

Attorneys for X CORP., successor in interest to
named defendant Twitter, Inc.

Dated: October 17, 2023

LICHTEN & LISS-RIORDAN, P.C

By: /s/ Shannon Liss-Riordan

Attorneys for Plaintiffs
WHITE COAT CAPTIONING, LLC; YES
CONSULTING, LLC; DIALOGUE MÉXICO S.A.
DE C.V.; AUTUMN COMMUNICATIONS, INC.;
and BUSINESS TRAINING WORKS, INC., on
behalf of themselves and all others similarly situated

[PROPOSED] ORDER

Pursuant to the Parties' Stipulation and for GOOD CAUSE appearing, the Court hereby orders that Plaintiffs shall file a further amended complaint by and including October 31, 2023, and X Corp.'s deadline to file responsive pleadings to such complaint shall be by and including November 21, 2023.

Dated: _____

Hon. Sallie Kim
United States Magistrate Judge

DECLARATION OF J. JONATHAN HAWK

I, J. Jonathan Hawk, declare:

1. I am a partner of the law firm White & Case LLP, attorneys of record in this action for X Corp., as successor in interest to named defendant Twitter, Inc. ("X Corp."). I have personal knowledge of the facts set forth herein and could testify competently thereto if called upon to do so.

2. Shannon Liss-Riordan, Plaintiffs' attorney of record, concurred in the filing of the attached joint stipulation, which concurrence shall serve in lieu of her signature on that filed document. I have obtained and will maintain records to support this concurrence for subsequent production to the Court if so ordered or for inspection upon request by a party until one year after resolution of the action, including appeal, if any.

Dated: October 17, 2023

WHITE & CASE LLP

By:

/s/ J. Jonathan Hawk

Attorneys for X CORP., successor in interest to
named defendant Twitter, Inc.